



COUNTY OF ERIE

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COUNTY EXECUTIVE

DEPARTMENT OF ENVIRONMENT & PLANNING

MARIA R. WHYTE
COMMISSIONER

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DEPUTY COMMISSIONER

October 27, 2014

Jeffrey A. Konsella, P.E.
New York Department of Environmental Conservation (NYSDEC)
Regional Water Engineer, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: State Pollutant Discharge Elimination System (SPDES) Permit NY0022136
Lackawanna Wastewater Treatment Plant (WWTP)
Total Phenolics Study
SPDES Permit Schedule of Compliance

Dear Mr. Konsella:

In accordance with the schedule of compliance listed in SPDES Permit NY0022136, the Erie County Division of Sewerage Management (ECDSM) is pleased to submit one (1) original and two (2) copies of the following information pertaining to total effluent phenolics discharges from the Erie County Sewer District No. 6 Lackawanna WWTP.

As required in the Lackawanna WWTP SPDES permit, total phenolics is sampled and tested from the treatment plant effluent a minimum of twice per month. The permit has an interim "monitor only" requirement, with a final limitation of 9.89 micrograms per liter ($\mu\text{g}/\text{l}$) upon approval of a "total phenolics study." The SPDES permit specifically notes the following:

The permittee shall achieve the Total Phenolics effluent limit when a Phenolics Study is submitted to and approved by the Department and implementation of the recommended actions, if required, is completed in accordance with the implementation schedule in the approved study.

The following is a summary of phenolics data collected from the effluent of the Lackawanna WWTP from when the modified SPDES permit came into effect in November 2012 through September 2014. The analytical method used was EPA Method 420.2.

b(d)(ii)

Erie County Sewer District No. 6
 Total Effluent Phenol Summary - November 2012 through September 2014

2012			2013			2014		
Date	Effluent, T. Phenol µg/L	Notes	Date	Effluent, T. Phenol µg/L	Notes	Date	Effluent, T. Phenol µg/L	Notes
11/7/2012	<5.0		1/7/2013	<5.0		1/6/2014	<5.0	
11/8/2012	12.0	Nov 2012 ave <8.5	1/8/2013	<5.0	Jan 2013 ave <5.0	1/7/2014	<5.0	Jan 2014 ave <5.0
12/4/2012	<5.0		2/5/2013	<5.0		2/3/2014	<5.0	
12/5/2012	<5.0	Dec 2012 ave <5.0	2/6/2013	<5.0	Feb 2013 ave <5.0	2/4/2014	7.0	Feb 2014 ave <6.0
			3/4/2013	<5.0		3/3/2014	<5.0	
			3/5/2013	<5.0	Mar 2013 ave <5.0	3/4/2014	8.0	Mar 2014 ave <6.5
			4/8/2013	<5.0		4/6/2014	<5.0	
			4/9/2013	7.0	April 2013 ave <6.0	4/7/2014	<5.0	April 2014 ave <5.0
			5/6/2013	7.0		5/6/2014	11.0	Weekly monitoring begins
			5/8/2013	13.0	May 2013 ave = 10.0	5/12/2014	<5.0	
			6/4/2013	<5.0		5/18/2014	<5.0	
			6/10/2013	<5.0	June 2013 ave <5.0	5/28/2014	<5.0	May 2014 ave <6.5
			7/8/2013	5.0		6/2/2014	<5.0	
			7/9/2013	<5.0	July 2013 ave <5.0	6/11/2014	<5.0	
			8/4/2013	<5.0		6/18/2014	<5.0	
			8/5/2013	5.0	Aug 2013 ave <5.0	6/23/2014	<5.0	
			8/3/2013	<5.0		6/29/2014	<5.0	
			8/4/2013	<5.0	Sept 2013 ave <5.0	7/7/2014	<5.0	
			10/7/2013	<5.0		7/15/2014	<5.0	
			10/8/2013	<5.0	Oct 2013 ave <5.0	7/23/2014	<5.0	
			11/3/2013	7.0		7/27/2014	<5.0	
			11/5/2013	<5.0	Nov 2013 ave <6.0			
			12/2/2013	<5.0		8/4/2014	<5.0	
			12/3/2013	<5.0	Dec 2013 ave <5.0	8/12/2014	<5.0	
						8/17/2014	<5.0	
						8/27/2014	<5.0	Aug 2014 ave <5.0
						8/3/2014	<5.0	
						8/8/2014	<5.0	
						8/15/2014	<5.0	
						8/21/2014	<5.0	
						8/30/2014	<5.0	Sept 2014 ave <5.0

A total of 23 months of data are presented, with 15 months having all effluent total phenolics results below the practical quantification limit. Only one month (May 2013) during the monitoring period had an average total phenolics greater than 9.89 $\mu\text{g/l}$ (10 $\mu\text{g/l}$, or within 1.1%). Considering only two (2) samples were collected in this month and the relative level of accuracy of the analytical methodology, the May 2013 average total effluent phenolics is essentially statistically equal to the final limitation.

Based upon the data collected during this monitoring period, it is not recommended that any modifications be made at the Lackawanna WWTP for total effluent phenolics. The ECDSM trusts that this information will meet with the NYSDEC's approval. If you have any questions, please contact me at (716) 858-7537.

Sincerely,



Joseph L. Fiegl, P.E.
Deputy Commissioner

Cc: Erie County Sewer District No. 6 Board of Managers
Bureau of Water Permits – NYSDEC Albany
D. Judd – NYSDEC Region 9
M. Whyte – Commissioner
G. Absolom/K. Kaminski/R. Klosko
M. Walker
J. Carr/D. Millar/M. Salah/6.2.3.SPDES Sanitary